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November 4, 2024

VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Because the parties' proposed dates do not change the current fact discovery deadline of March 12, 2025, no changes are necessary to the case management plan and scheduling order. All other existing discovery deadlines remain in effect. So Ordered.

Dated: November 6, 2024
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

Re: Letter re Revised Case Management Plan
Abercrombie & Fitch Trading Co. v. Quester (U.S.) Enterprises, Inc. et. al.
Case No. 1:24-cv-06521-LGS

Dear Hon. Schofield,

Pursuant to this Court's Order at ECF No. 70, plaintiff Abercrombie & Fitch Trading Co. ("Plaintiff" or "Abercrombie") hereby submits a revised Case Management Plan on behalf of the Parties.

The Court's Order at ECF No. 70 orders "the parties" to confer and set deadlines in accordance with a fact discovery deadline of March 12, 2025. As defendant Quester (U.S.) Enterprises, Inc. ("Quester") was the only defendant who had answered by the time the Parties' Rule 26(f) conference was due, Plaintiff submitted the initial Case Management Plan based on its meeting with Quester. ECF No. 65. Modern Perfumes LLC ("Modern") filed its Answer on September 30, 2024. ECF No. 58. Scentscity Incorporated ("Scentscity") filed its Answer today. ECF No. 86.

Currently, 9 Defendants have yet to file their Answer to the Complaint, 3 Defendants have defaulted, and 2 Defendants have yet to be served. Plaintiff intends to file a request for entry of default on the defaulting defendants and are in the process of serving the 2 foreign Defendants – Farhad International Pte Ltd. and Safire Trading. Defendant Acme International, LLC's ("Acme") Answer is due November 8, 2024; defendants Perfume Network, Inc. ("Perfume Network"), Fragrancenet.com, Inc. ("Fragrancenet"), Sapphire Trading, Inc.'s ("Sapphire Trading"), and Flora 247 Inc.'s ("Flora") Answer is due November 12, 2024; defendant Fame Ascent Trading's ("Fame") Answer is due November 13, 2024; defendant Beauty Store LLC's ("Beauty Store") Answer is due November 25, 2024; defendant Fragrancex.com's ("FragranceX") Answer is due December 6, 2024; and defendant Jizan Perfumes LLC's ("Jizan") Answer is due December 30, 2024.

Although Plaintiff believes that only Parties who have filed an Answer in the matter can actively participate in the case, in an effort to comply with the Court's Order at ECF No. 70, Plaintiff has or attempted to meet and confer with Defendants regarding a modified Case Management Plan. Plaintiff and Answering Defendants Quester, Scentscity, and Modern, along with Defendants Fragrancenet, FragranceX, Acme, Perfume Network, Sapphire Trading, and Flora on behalf of their counsel, have agreed to the below modified schedule:

November 4, 2024

Page 2

Event	Date
Initial RFPs Due	12/13/24
Interrogatories Due	12/13/24
Production of Documents in Response to Initial RFPs Complete	1/30/25
No additional parties joined after	1/31/25
Amended pleadings due	2/3/25
RFAs served by	2/10/25
Depositions complete	3/12/25

Beauty Store has opposed the above dates and requests a two-week extension on all dates and does not agree to the joinder of additional parties deadline of 1/31/25. Jizan has not provided their consent to the above dates as its counsel indicated she intends to challenge jurisdiction. Plaintiff has not met and conferred with Fame as it is unclear whether it is represented by counsel.

Respectfully Submitted,

/s/ Tara A. Currie

Tara A. Currie

Attorneys for Plaintiff

Abercrombie & Fitch Trading Co.